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June 28, 2019

Client/Matter No. 16390-1

## **VIA E-MAIL**

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**RE: Supplemental Response to Request for Information  
Pursuant to Sections 107(a) and 104(e) of the Comprehensive Environmental  
Response, Compensation and Liability Act for the PROTECO Site  
in Peñuelas, Puerto Rico**

Dear Ms. Lehsak and Ms. Luna:

On behalf of Henkel Puerto Rico, Inc. ("Henkel P.R."), we submit the following supplemental response to the Notice of Potential Liability and Request for Information Pursuant to Sections 107(a) and 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA") for the PROTECO site in Peñuelas, Puerto Rico (the "Site") dated March 28, 2019 (the "104(e) Request"), which follows Henkel P.R.'s initial response provided on

May 31, 2019 (the "Initial Responses"). Pursuant to correspondence with Ms. Leshak on June 10, 2019, Henkel P.R.'s supplemental response is due to the United States Environmental Protection Agency ("EPA") on June 28, 2019.

The responses to the 104(e) Request set forth herein supersede those provided in the Initial Responses. Henkel P.R. specifically reserves the right to supplement or amend these responses as appropriate.

Do not hesitate to contact me with any questions or concerns regarding this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "M. Policastro", written in a cursive style.

MARC D. POLICASTRO

MDP/djm  
Enclosures

cc: Jonathan Blaine (*via e-mail*)  
Robert McNamee (*via e-mail*)  
Melissa Jacobs (*via e-mail*)

## **EXHIBIT A**

### **GENERAL OBJECTIONS**

1. Henkel P.R. objects to the 104(e) Request and each individual request on the basis that they are overbroad and seek information beyond the scope of EPA's authority under CERCLA, 42 U.S.C. §9604(e). Specifically, Section 104(e)(1) of CERCLA, 42 U.S.C. §9604(e)(1), provides that the "authority of this subsection may be exercised only for the purposes of determining the need for response, or choosing or taking any response action under this subchapter, or otherwise enforcing the provisions of this subchapter." Henkel P.R. objects to the 104(e) Request and each individual request to the extent they seek information or documentation that is not directly related to EPA's efforts to determine the need for a response action or the specifics of any such response action with respect to the Site.
2. Henkel P.R. objects to the 104(e) Request and each individual request to the extent that they seek information that is not relevant to the purposes outlined in EPA's March 28, 2019 letter enclosing the 104(e) Request.
3. Henkel P.R. objects to the 104(e) Request and each individual request to the extent that they seek information that is privileged, including, but not limited to, information and documents protected by the attorney-client privilege and attorney work product doctrine.
4. Henkel P.R. objects to the 104(e) Request and each individual request to the extent that the terms used therein are broader or otherwise inconsistent with how those terms are defined in CERCLA, 42 U.S.C. §9601.
5. Henkel P.R. objects to the 104(e) Request and each individual request on the basis that EPA did not provide sufficient time for Henkel P.R. to review available documentation and prepare a response to each request, many of which are broad and require review of voluminous records in order to adequately respond.
6. Henkel P.R. reserves the right to supplement or amend the responses contained herein, including these objections, as additional information and documents become available.

**SUPPLEMENTAL RESPONSE TO REQUEST FOR INFORMATION**

1. Answer the following questions regarding the Company:

a. State the correct legal name and mailing address for the Company.

**RESPONSE:**

**Henkel Puerto Rico, Inc.  
9 V. Quilinchini Avenue  
Highway 121 and KM 125.3  
P.O. Box 669  
Sabana Grande, Puerto Rico 00637**

b. State the name(s) and address(es) of the President, Chief Executive Officer, and the Chairman of the Board (or other presiding officer) of the Company.

**RESPONSE:**

**Timothy Viskocil, President  
Henkel Puerto Rico, Inc.  
9 V. Quilinchini Avenue  
P.O. Box 669  
Sabana Grande, Puerto Rico 00637**

c. Identify the state/commonwealth and date of incorporation of the Company and the name of its agents for service of process in the state/commonwealth of incorporation and in Puerto Rico, if different.

**RESPONSE:**

**State of Incorporation: Connecticut**

**Date of Incorporation: May 18, 1965**

**Agent: Corporation Service Company  
50 Weston Street  
Hartford, CT 06120-1537**

d. Identify any successor corporations, predecessor corporations, or other entities related to the Company. If the Company is or was a subsidiary or affiliate of another corporation or other entity, identify each of those other entities' Chief Executive Officers, Presidents, and Chairpersons of the Board. Identify the state/commonwealth of incorporation and agents for service of process in the state/commonwealth of incorporation and in Puerto Rico, if different, for each entity identified in your response to this question.

**RESPONSE:** Henkel P.R. objects to this request on the basis that this Request is overbroad, unduly burdensome, and seeks publically available information that is equally available to EPA. Henkel P.R. further objects to this request on the basis that this Request is not authorized by law and seeks information beyond the scope of that which EPA is authorized to seek under CERCLA, 42 U.S.C. §9604(e). Subject to the foregoing objections and Henkel P.R.'s General Objections, Henkel Puerto Rico, Inc. is a wholly owned subsidiary of Henkel US Operations Corporation, formerly known as Henkel Corporation, which is a wholly owned subsidiary of Henkel of America, Inc. Henkel US Operations Corporation is a Delaware corporation. The current President of Henkel US Operations Corporation is Michael Olosky. The agent for service of process on Henkel US Operations Corporation in Delaware is Corporation Service Company, 251 Little Falls Drive, Wilmington, DE 19808.

2. State the corporate history of the Company, including all name changes and mergers. List all names under which the Company has operated and has been incorporated. For each other name, provide the following information:

**RESPONSE:** Henkel P.R. objects on the basis that this Request is not authorized by law and seeks information beyond the scope of that which EPA is authorized to seek under CERCLA, 42 U.S.C. §9604(e). Subject to the foregoing objections and Henkel P.R.'s General Objections, Henkel Puerto Rico, Inc. has undergone the following name changes:

- May 18, 1965 - Contract Chemical Manufacturing Corporation Incorporated
  - February 2, 1972 - Name Change from Contract Chemical Manufacturing Corporation to Loctite Puerto Rico, Inc.
  - January 3, 1997 - Affiliate of Henkel US Operations Corporation, formerly known as Henkel Corporation, acquires Loctite Puerto Rico, Inc.
  - June 27, 2002 - Name Change from Loctite Puerto Rico, Inc. to Henkel Loctite Puerto Rico, Inc.
  - June 1, 2005 - Name Change from Henkel Loctite Puerto Rico, Inc. to Henkel Puerto Rico, Inc.
- a. Whether that other company or business continues to exist, indicating the date and means by which it ceased operations (e.g., dissolution, bankruptcy, sale) if it is no longer in business.

**RESPONSE:** Subject to Henkel P.R.'s General Objections, Henkel P.R. responds that Henkel Puerto Rico, Inc. continues to exist.

- b. Names, addresses, and telephone numbers of all registered agents, officers, and operations management personnel; and

**RESPONSE:** Henkel P.R. objects to this Request on the basis that it is vague, overbroad in scope, and unduly burdensome. Henkel P.R. further objects on the basis that this Request is not authorized by law and seeks information beyond the scope of that which EPA is authorized to seek under CERCLA, 42 U.S.C. §9604(e). Subject to the foregoing objections and Henkel P.R.'s General Objections, Henkel P.R. has identified the following management personnel:

- Carlos Rodríguez  
SHE Manager  
2012-Present
- Sigfredo Rodríguez  
SHE Manager  
1991-2012
- Juan Enrique Negrón Rodríguez  
Safety, Security and Environmental Affairs Coordinator  
1988-1991

**Henkel P.R. will provide additional information responsive to this Request if such information exists and becomes available to Henkel P.R.**

- c. Names, addresses, and telephone numbers of all subsidiaries, unincorporated divisions or operating units, affiliates, and parent corporations if any, of that other company.

**RESPONSE:** Henkel P.R. objects to this Request on the basis that it is vague, overbroad in scope, and unduly burdensome. Henkel P.R. further objects on the basis that this Request is not authorized by law and seeks information beyond the scope of that which EPA is authorized to seek under CERCLA, 42 U.S.C. §9604(e). Subject to the foregoing objections and Henkel P.R.'s General Objections, Henkel P.R. responds that Henkel Puerto Rico, Inc. does not have any subsidiaries. Henkel P.R. does have affiliates as referenced in the response to Request No. 1(d).

3. Identify all changes in ownership relating to the Company from its date of incorporation to the present, including the date of any ownership change. If any owner was/is a corporation, identify if the corporation was a subsidiary or division of another corporation. In your identification of any corporation, it is requested that you provide the full corporate name, the state/commonwealth of incorporation, and all fictitious names used/held by that corporation.

**RESPONSE:** Henkel P.R. objects to this Request on the basis that it is vague, overbroad in scope, unduly burdensome, and duplicative of Request No. 1 and No.

**2. Henkel P.R. further objects on the basis that this Request is not authorized by law and seeks information beyond the scope of that which EPA is authorized to seek under CERCLA, 42 U.S.C. §9604(e). Subject to the foregoing objections and Henkel P.R.'s General Objections, Henkel P.R. refers EPA to Henkel P.R.'s responses to Requests No. 1 and No. 2.**

4. For each owner that is a subsidiary of another corporation identified in your answer to Request #3, above, please provide a chart that details the corporate structure from that other company through all intermediary entities to the ultimate corporate parent. For purposes of this information request, the term "ultimate corporate parent" means the corporate entity that, while owning or controlling the majority of the shares of common stock in a subsidiary corporation, is not primarily owned/controlled by another corporation.

**RESPONSE: Henkel P.R. objects to this Request on the basis that it is vague, overbroad in scope, and unduly burdensome. Henkel P.R. further objects on the basis that this Request is not authorized by law and seeks information beyond the scope of that which EPA is authorized to seek under CERCLA, 42 U.S.C. §9604(e). Subject to the foregoing objections and Henkel P.R.'s General Objections, Henkel P.R. refers EPA to Henkel P.R.'s responses to Requests No. 1, No. 2 and No. 3.**

5. Provide copies of the Company's authority to do business in Puerto Rico. Include all authorizations, withdrawals, suspensions, and reinstatements.

**RESPONSE: Henkel P.R. objects to this Request on the basis that it seeks publically-accessible information and documentation equally available to EPA. Subject to the foregoing objection and Henkel P.R.'s General Objections, Henkel P.R. refers EPA to the documents produced herewith, Bates-stamped HPR1988 – HPR2018.**

6. State the dates during which the Company owned, operated, or leased any portion of the Facility, and provide copies of all documents evidencing or relating to such ownership, operation, or lease, including but not limited to purchase and sale agreements, deeds, leases, etc.

**RESPONSE: Subject to Henkel P.R.'s General Objections, Henkel P.R. responds that a predecessor of Henkel P.R., Loctite Puerto Rico, Inc., acquired the Facility on October 3, 1973.**

7. Indicate whether the Company has ever operated at a location other than the Facility. If yes, provide the correct names and addresses of the Company's other facilities where the Company carried out its operations.

**RESPONSE: Henkel P.R. objects to this request to the extent it seeks information concerning entities, businesses, or operations of the Company or affiliated entities that are not relevant to the Facility or the Site. Subject to the foregoing objection and Henkel P.R.'s General Objections, Henkel P.R. responds that it has not**

**operated at any location other than the Facility.**

8. Describe in detail the nature of the business and the operations conducted at the Facility and at any locations identified in response to Request #7, above, during the period that the Company operated there. Provide a brief description of the Company's operations at each facility, including the following:
- a. The date such operations commenced and concluded.

**RESPONSE: Subject to Henkel P.R.'s General Objections, Henkel P.R. responds that its predecessors began operations at the Facility in or about 1973. Henkel P.R.'s operations at the Facility are ongoing.**

- b. The types of work performed at each facility, including but not limited to the industrial, chemical, or institutional processes and treatments undertaken at each facility.

**RESPONSE: Subject to Henkel P.R.'s General Objections, Henkel P.R. responds that, during the time frame that Henkel P.R. had a relationship with the Site, the Facility was utilized to manufacture sealants and adhesives. The following two processes were utilized at the Facility: (1) the cyanoacrylate adhesives process and (2) the ethylene glycol dimethacrylate process. The products resulting from these processes were mixed with stabilizers and other additives to produce a final product that was either sold in bulk or packed in containers for sale.**

9. Describe how the Company came to possess the hazardous substances that came to be located at the Site.

**RESPONSE: Subject to Henkel P.R.'s General Objections, Henkel P.R. responds that, based on its investigation to date and on information and belief, Henkel P.R. was not responsible for any hazardous substances that came to be located at the Site. Henkel P.R. refers EPA to the documents produced herewith.**

10. List all hazardous substances used, generated, treated, stored, disposed of, manufactured, recycled, recovered, treated, or otherwise processed during the Company's operations at the Facility.

**RESPONSE: Subject to Henkel P.R.'s General Objections, Henkel P.R. responds that the following hazardous substances may have been used at the Facility; however, Henkel P.R. in no way admits that any of the hazardous substances listed below came to be located at the Site and refers EPA to the response to Request No. 9:**

- Methyl methacrylate;
- Heptane;
- Cyclohexane;
- Chlorinated solvent;



- Polymerized caustic;
- Anaerobic reduction waste;
- Anaerobic reduction washes;
- Acidic anaerobic waste;
- Cyanoacrylate washes;
- Polymerized anaerobic reaction; and
- Anaerobic by-product waste (methanol).

11. List and fully describe all waste streams generated from the Company's operations, including solid, liquid, or any other type of waste.

**RESPONSE: Subject to Henkel P.R.'s General Objections, Henkel P.R. responds that, on information and belief, during the time frame that Henkel P.R. had a relationship with the Site, waste streams from the Facility included both hazardous and non-hazardous waste, including non-hazardous waste water. Hazardous wastes were stored in 55 gallon drums and disposed of at appropriate, outside facilities within 90 days. Non-hazardous waste, including waste water, was collected and disposed of at appropriate, outside facilities. Henkel P.R. also refers EPA to the documents produced herewith.**

12. Describe in detail the handling, storage, and disposal practices employed by the Company for each waste stream resulting from the Company's operations.

**RESPONSE: Subject to Henkel P.R.'s General Objections, Henkel P.R. refers EPA to the response to Request No. 11, the documents previously produced to EPA, and the documents produced herewith.**

13. Identify all individuals who had responsibility for the Company's environmental and waste management decisions between 1975 and 1999 (e.g., responsibility for decisions regarding the disposal, treatment, storage, recycling, or sale of the Company's hazardous substances, hazardous wastes, and industrial wastes).
  - a. Provide each such individual's job title, duties, dates performing those duties, supervisors for those duties, current position, and if applicable, the date of the individual's resignation or termination.
  - b. Provide the nature of the information possessed by each such individual concerning the Company's waste management.

**RESPONSE: Subject to Henkel P.R.'s General Objections, Henkel P.R. refers EPA to Henkel P.R.'s response to Request No. 2(b), the documents previously produced by Henkel P.R. to EPA, and the documents produced herewith.**

14. For each type of hazardous substance, hazardous waste, and industrial waste used or generated by the Company, describe the Company's agreements or other arrangements for its disposal, treatment, storage, recycling, or sale.
- a. Provide any agreement and document, including waste logs, journals, manifests, or notes, related to any transfer of hazardous substances, hazardous wastes, and industrial wastes from the Company's Facility that came to be located at the Site.
  - b. Provide all correspondence and written communications between the Company and each owner/operator of the Site regarding the Company's hazardous substances, hazardous wastes, and industrial wastes that came to be located at the Site.

**RESPONSE: Subject to Henkel P.R.'s General Objections, Henkel P.R. refers EPA to the documents previously produced by Henkel P.R. to EPA and the documents produced herewith.**

15. Provide agreements and documents related to the following, including waste logs, journals, manifests, or notes, as set forth below:
- a. The locations where the Company sent each type of hazardous substance, hazardous waste, and industrial waste for disposal, treatment, or recycling.
  - b. List all Waste Transporters used by the Company.
  - c. For each type of hazardous substance, hazardous waste, and industrial waste, specify which Waste Transporter picked it up.
  - d. For each type of hazardous substance, hazardous waste, and industrial waste, state how frequently each Waste Transporter picked up such waste.
  - e. For each type of hazardous substance, hazardous waste, and industrial waste, provide the volume picked up by each Waste Transporter (per week, month, or year).
  - f. For each type of hazardous substance, hazardous waste, and industrial waste, identify the dates (beginning & ending) such waste was picked up by each Waste Transporter.
  - g. Indicate the ultimate location for each type of hazardous substance, hazardous waste, and industrial waste. Provide all documents indicating the ultimate disposal/recycling/treatment location for each type of hazardous substance, hazardous waste, and industrial waste.
  - h. Describe how the Company managed pickups of each hazardous substance, hazardous waste, and industrial waste including but not limited to: (i) the method for inventorying each type of hazardous substance, hazardous waste, and industrial waste; (ii) the method for requesting each type of hazardous substance, hazardous waste, and industrial waste to be picked up; (iii) the identity of the Waste Transporter

employee/agent contacted for pickup of each type of hazardous substance, hazardous waste, and industrial waste; and (iv) the amount paid or the rate paid for the pickup of each type of hazardous substance, hazardous waste, and industrial waste;

- i. Identify the individual or organization that selected the location where each of the Company's wastes were taken. Describe the basis for and provide any documents supporting the answer to this Request.

**RESPONSE: Subject to Henkel P.R.'s General Objections, Henkel P.R. refers EPA to the documents previously produced by Henkel P.R. to EPA and the documents produced herewith.**

16. If not already provided, specify the dates and circumstances when the Company's hazardous substances, hazardous wastes, and/or industrial wastes were sent, brought, or moved to the Site, and identify the names, addresses, and telephone numbers of the person(s) making arrangements for the containers (e.g., 55-gallon drum, dumpster, etc.) holding hazardous substances, hazardous wastes, and/or industrial wastes to be sent, brought, or transported to the Site. Please also provide all documents that support or memorialize the answer to this Request.

**RESPONSE: Subject to Henkel P.R.'s General Objections, Henkel P.R. refers EPA to the documents previously produced by Henkel P.R. to EPA and the documents produced herewith.**

17. Identify, describe, and provide all documents that refer or relate to the following:
  - a. The nature, including the chemical content, characteristics, physical state (e.g., solid, liquid), and quantity (volume and weight) of all hazardous substances, hazardous wastes, and industrial wastes involved in each arrangement transferring materials from any facility owned or operated by the Company (including the Facility) to any other facility.
  - b. In general terms, the nature and quantity of the non-hazardous substances involved in each such arrangement;
  - c. The hazardous substances being mixed or combined with other hazardous substances or non-hazardous substances for each such arrangement. Indicate whether such mixing or combining is common in the industry. Indicate whether the Company was ever asked to stop mixing or combining the hazardous substances with the non-hazardous substances.
  - d. Other materials other than the hazardous substances that were involved in the transaction.
  - e. The condition of the transferred material containing hazardous substances when it was stored, disposed of, treated, or transported for disposal or treatment.

- f. The markings on and type, condition, and number of containers in which the hazardous materials were contained when they were stored, disposed, treated, or transported for disposal or treatment.
- g. All tests, analyses, analytical results, and manifests concerning each hazardous substance, hazardous waste, and industrial waste involved in each transaction. Include information regarding who conducted the test and how the test was conducted (batch sampling, representative sampling, splits, composite, etc.).

**RESPONSE: Subject to Henkel P.R.'s General Objections, Henkel P.R. refers EPA to the documents previously produced by Henkel P.R. to EPA and the documents produced herewith.**

18. Indicate how long the Company has had a relationship with the owner(s) and/or operator(s) of the Site.

**RESPONSE: Subject to Henkel P.R.'s General Objections, Henkel P.R. has identified records maintained at the Facility that evidence interaction between Henkel P.R. and the operators of the Site between approximately 1994 and 1999. Henkel P.R. refers EPA to the documents previously produced by Henkel P.R. to EPA and the documents produced herewith.**

19. Identify any individuals, including former and current employees, who may be knowledgeable of the Company's operations and practices concerning the handling, storage, and disposal of hazardous substances.

**RESPONSE: Subject to Henkel P.R.'s General Objections, Henkel P.R. refers EPA to the response to Request No. 2(b).**

20. Please provide all documents, if not already requested above, that support your responses to Requests #1 - #19, above.

**RESPONSE: Subject to Henkel P.R.'s General Objections, Henkel P.R. refers EPA to the documents previously produced by Henkel P.R. to EPA and the documents produced herewith.**

21. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following:

- a. The Company's document retention policy between 1975 and 2018.
- b. A description of how the records were destroyed (burned, trashed, etc.) and the approximate date of destruction.
- c. A description of the type of information that would have been contained in the

documents.

- d. The name, job title, and most current address known by you of the person(s) who would have produced these documents, the person(s) who would have been responsible for the retention of these documents, the person(s) who would have been responsible for the destruction of these documents, and the person(s) who had and/or still may have the originals or copies of these documents.
- e. The names and most current address of any person(s) who may possess documents relevant to this inquiry.

**RESPONSE: Subject to Henkel P.R.'s General Objections, Henkel P.R. responds that representatives of Henkel P.R. visited the Facility in May 2019 and reviewed available information for responsiveness to this request. To date, Henkel P.R. has not identified any documents that are unavailable for production to EPA as a result of their prior destruction or otherwise. Notwithstanding the foregoing, Henkel P.R. refers EPA to its document retention policies dated October 2004, September 2009, December 2012 and November 2016 which are produced herewith, Bates-stamped HPR2019 – HPR02075. Henkel P.R. is continuing to review its files for other such policies and will provide same when and if they become available.**

- 22. Please provide copies of the Company's financial statements, shareholder's reports, financial audits, or other financial reports showing its assets, profits, liabilities, and current financial status for the last five years.

**RESPONSE: Henkel P.R. objects to this Request on the basis that it is vague, overbroad in scope, and unduly burdensome. Henkel P.R. further objects on the basis that this Request is not authorized by law and seeks information beyond the scope of that which EPA is authorized to seek under CERCLA, 42 U.S.C. §9604(e). Finally, Henkel P.R. objects to this request on the basis that it seeks publically-available information equally available to EPA.**

- 23. List and provide a copy of all agreements or contracts, including but not limited to insurance policies and indemnification agreements, held or entered into by the Company or its parent corporation(s), subsidiary, or subsidiaries that could indemnify it against any liability that it may have under CERCLA for releases or threatened releases of hazardous substances at and from the Facility. In response to this Request, please provide not only those insurance policies and agreements that currently are in effect, but also provide those that were in effect during the period(s) when any hazardous substances, hazardous wastes, and/or industrial wastes may have been released or threatened to be released into the environment at or from the Facility.

**RESPONSE: Henkel P.R. objects to this Request on the basis that it is vague, overbroad in scope, and unduly burdensome. Henkel P.R. further objects on the basis that this Request is not authorized by law and seeks information beyond the**

**scope of that which EPA is authorized to seek under CERCLA, 42 U.S.C. §9604(e). Subject to the foregoing objections and Henkel P.R.'s General Objections, Henkel P.R. will provide documents responsive to this request in a supplemental response, if such documents exist and are available to Henkel P.R.**

24. State whether any claim or claims have been made by the Company to any insurance company for any loss or damage *related* to operation at the Site, and if so, identify each claim by stating the name of the claimant, the name and address of the insurance company, the policy number, the named insured on the policy, claim number, date of claim, amount of claim, the specific loss or damage claimed, the current status of the claim, and the amount, date, and recipient of any payment made on the claim.

**RESPONSE: Henkel P.R. objects to this Request on the basis that it is vague, overbroad in scope, and unduly burdensome. Henkel P.R. further objects on the basis that this Request is not authorized by law and seeks information beyond the scope of that which EPA is authorized to seek under CERCLA, 42 U.S.C. §9604(e). Subject to the foregoing objection and Henkel P.R.'s General Objections, Henkel P.R. responds that, on information and belief, no such claim or claims have been made by Henkel P.R. to date.**

25. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question contained herein or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

**RESPONSE: Subject to Henkel P.R.'s General Objections, Henkel P.R. refers EPA to the response to Request No. 8.**

26. State the name, title, and address of each individual who assisted or was consulted in the preparation of the response to this Request for Information. In addition, state whether this person has personal knowledge of the information in the answers provided.

**RESPONSE: Henkel P.R. responds that the following individuals, with the assistance of counsel, assisted or were consulted in the process of preparing this response:**

**Jonathan Blaine  
Head – Sustainability and Environmental Affairs  
Henkel Corporation  
One Henkel Way  
Rocky Hill, CT 06067**

**The individuals listed above obtained the knowledge required to respond to the 104(e) Request through review of the available documents.**